

UNITED STATES DISTRICT COURT
DISTRICT OF RHODE ISLAND

QUICK FITTING, INC.,)	
Plaintiff)	
)	
v.)	C.A. No. 1:11-cv-00463-PAS
)	
ZHEJIANG XINGXIN AITE COPPER)	
MFG CO. LTD., QUIFU “FRANK” XIE,)	
FORLAND INTERNATIONAL COMPANY,)	
YORHE INTELLIGENT CONTROL)	
COMPANY, LTD., a/k/a YORHE VALVE)	
OR YORKE VALVE, AND UNKNOWN)	
JOHN DOE INDIVIDUALS AND/OR ENTITIES,)	
Defendants)	

**DEFENDANTS YORHE FLUID INTELLIGENT CONTROL CO. LTD.
AND FORLAND INTERNATIONAL TRADING CO. LTD.’S
ANSWER TO PLAINTIFF’S FIRST AMENDED VERIFIED COMPLAINT**

Defendants Yorhe Fluid Intelligent Control Co. Ltd. and Forland International Trading Co. Ltd. (hereinafter, “Defendants”) hereby answer Plaintiff Quick Fitting, Inc.’s First Amended Verified Complaint as follows:

FIRST DEFENSE

The Court lacks personal jurisdiction over the Defendants, and service of process upon them has been incomplete and/or defective.

SECOND DEFENSE

As to Introductory Paragraph

With respect to the un-numbered allegations in the introductory paragraph of the Amended Complaint, Defendants admit that Plaintiff is seeking the relief described, but deny each and every other allegation set forth in said paragraph.

As to “The Parties”

1-4. Defendants admit the allegations set forth in Paragraphs 1 through 4 of the Amended Complaint.

5-8. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations set forth in Paragraphs 5 through 8 of the Amended Complaint, and thus deny the same.

9-10. Defendants admit the allegations set forth in Paragraphs 9 and 10 of the Amended Complaint.

As to “Jurisdiction and Venue”

11. Defendants deny the allegations set forth in Paragraph 11 of the Amended Complaint.

12. Defendants lack knowledge or information sufficient to form a belief with respect to the truth of the allegation set forth in Paragraph 12 of the Amended Complaint, and thus deny the same.

13-14. Defendants deny the allegations set forth in Paragraphs 13 and 14 of the Amended Complaint.

As to “Facts Specific to All Counts”

15-52. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations set forth in Paragraphs 15 through 52 of the Amended Complaint and thus deny the same. Answering further, Defendants assert that the various documents and agreements referred to in said Paragraphs speak for themselves, and that the selected quotes from said documents do not provide the entire relevant content and substance of the documents.

53. Defendants admit the allegations set forth in Paragraphs 53 of the Amended Complaint.

54. Defendants deny the allegations set forth in Paragraph 54 of the Amended Complaint.

55. Defendants admit the allegations set forth in Paragraph 55 of the Amended Complaint.

56-60. Defendants deny the allegations set forth in Paragraphs 56 through 60 of the Amended Complaint.

(AS TO COUNT I)

61. With respect to the allegations set forth in Paragraph 61 of the Amended Complaint Defendants repeat and incorporate herein by reference their answers to the preceding allegations set forth in the Amended Complaint.

62-67. Defendants deny the allegations set forth in Paragraphs 62 through 67 of the Amended Complaint.

(AS TO COUNT II)

68. With respect to the allegations set forth in Paragraph 68 of the Amended Complaint Defendants repeat and incorporate herein by reference their answers to the preceding allegations set forth in the Amended Complaint.

69-72. Defendants lack knowledge or information sufficient to form a belief with respect to the truth of the allegations set forth in Paragraphs 69 through 72 of the Amended Complaint, and thus deny the same.

(AS TO COUNT III)

73. With respect to the allegations set forth in Paragraph 73 of the Amended Complaint Defendants repeat and incorporate herein by reference their answers to the preceding allegations set forth in the Amended Complaint.

74-82. Defendants lack knowledge or information sufficient to form a belief with respect to the truth of the allegations set forth in Paragraphs 74 through 82 of the Amended Complaint, and thus deny the same.

(AS TO COUNT IV)

83. With respect to the allegations set forth in Paragraph 83 of the Amended Complaint Defendants repeat and incorporate herein by reference their answers to the preceding allegations set forth in the Amended Complaint.

84. Defendants admit the allegations set forth in Paragraph 84 of the Amended Complaint.

85-87. Defendants lack knowledge or information sufficient to form a belief with respect to the truth of the allegations set forth in Paragraphs 85 through 87 of the Amended Complaint, and thus deny the same.

(AS TO COUNT V)

88. With respect to the allegations set forth in Paragraph 88 of the Amended Complaint Defendants repeat and incorporate herein by reference their answers to the preceding allegations set forth in the Amended Complaint.

89-90. Defendants deny the allegations set forth in Paragraphs 89 and 90 of the Amended Complaint.

(AS TO COUNT VI)

91. With respect to the allegations set forth in Paragraph 91 of the Amended Complaint Defendants repeat and incorporate herein by reference their answers to the preceding allegations set forth in the Amended Complaint.

92. Defendants admit the allegations set forth in Paragraph 92 of the Amended Complaint.

93-94. Defendants deny the allegations set forth in Paragraphs 93 and 94 of the Amended Complaint.

95-96. Defendants lack knowledge or information sufficient to form a belief with respect to the truth of the allegations set forth in Paragraphs 95 and 96 of the Amended Complaint, and thus deny the same.

97-99. Defendants deny the allegations set forth in Paragraphs 97 through 99 of the Amended Complaint.

THIRD DEFENSE

The Amended Complaint fails to state a claim against these Defendants upon which relief can be granted.

FOURTH DEFENSE

Plaintiff's alleged claims are precluded by the doctrine of estoppel.

FIFTH DEFENSE

Plaintiff's alleged claims are precluded by the doctrine of waiver.

SIXTH DEFENSE

Defendants' business conduct is permitted by the various documents and agreements upon which Plaintiff relies, particularly in view of the fact that Plaintiff has discontinued purchases from XXAT.

SEVENTH DEFENSE

Plaintiff's alleged claims are precluded by the doctrine of unclean hands.

WHEREFORE, Defendants Yorhe Intelligence Control Company, Ltd. and Forland International Trading Co., Ltd. demand judgment denying and dismissing the Amended Complaint and awarding them costs, counsel fees, and such other and further relief as the Court may deem appropriate.

/s/ William R. Landry

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Dated: March 22, 2013

CERTIFICATE OF SERVICE

I hereby certify that on this 22nd day of March, 2013, the within document was filed electronically and made available for viewing and downloading from the Court's Electronic Case Filing System by all parties, represented as follows:

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/s/ William R. Landry